

COHN LIFLAND PEARLMAN
HERRMANN & KNOPF LLP
PETER S. PEARLMAN
JEFFREY W. HERRMANN
Park 80 West – Plaza One
250 Pehle Avenue, Suite 401
Saddle Brook, NJ 07663
Telephone: 201/845-9600
201/845-9423 (fax)

Liaison Counsel for Plaintiff

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

CITY OF STERLING HEIGHTS)	No. 2:12-cv-05275-MCA-LDW
GENERAL EMPLOYEES')	
RETIREMENT SYSTEM, Individually)	<u>CLASS ACTION</u>
and on Behalf of All Others Similarly)	
Situated,)	NOTICE OF MOTION FOR
)	PRELIMINARY APPROVAL OF
Plaintiff,)	CLASS ACTION SETTLEMENT
)	
vs.)	
)	
PRUDENTIAL FINANCIAL, INC., et)	
al.,)	
)	
Defendants.)	
)	

PLEASE TAKE NOTICE that on May 16, 2016 or such other date as the Court may set, the undersigned, counsel for Lead Plaintiffs, hereby move before this Court for an order: (i) preliminarily approving the settlement of this action in accordance with a Stipulation of Settlement dated April 18, 2016 submitted herewith (the “Settlement Agreement”); (ii) appointing a Claims Administrator and directing that notice be issued in accordance with that process set forth in ¶¶5 and 6 of the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice, which is submitted herewith; and (iii) scheduling a hearing to determine whether the proposed settlement of this action on the terms and conditions provided for in the Settlement Agreement is fair and reasonable and adequate to the Class and should be approved by the Court, whether a judgment should be entered in the form attached to the Settlement Agreement as Exhibit B, determining any amount of fees and expenses that should be awarded to Lead Counsel and Lead Plaintiffs for their services to the Class, and to hear any objections by any Class Member to the Settlement Agreement or Plan of Allocation or any award of fees and expenses to Lead Counsel and to Lead Plaintiffs, and to consider such other matters as the Court may deem appropriate;

PLEASE TAKE FURTHER NOTICE that in support of this motion Lead Plaintiffs shall rely upon the Settlement Agreement, Lead Plaintiffs’ Memorandum in Support of Preliminary Approval of Class Action Settlement, and all other documents submitted herewith;

PLEASE TAKE FURTHER NOTICE that a [Proposed] Order Preliminarily Approving Settlement and Providing for Notice is submitted herewith.

DATED: April 19, 2016

Respectfully submitted,

COHN LIFLAND PEARLMAN
HERRMANN & KNOPF LLP
PETER S. PEARLMAN
JEFFREY W. HERRMANN

s/ Peter S. Pearlman
PETER S. PEARLMAN

Park 80 West – Plaza One
250 Pehle Avenue, Suite 401
Saddle Brook, NJ 07663
Telephone: 201/845-9600
201/845-9423 (fax)

Liaison Counsel for Plaintiff

ROBBINS GELLER RUDMAN
& DOWD LLP
SHAWN A. WILLIAMS
AELISH M. BAIG
ARMEN ZOHRABIAN
DAVID W. HALL
SUNNY S. SARKIS
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
ELLEN GUSIKOFF STEWART
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

Lead Counsel for Plaintiff

SULLIVAN, WARD, ASHER &
PATTON, P.C.
MICHAEL J. ASHER
1000 Maccabees Center
25800 Northwestern Highway
Southfield, MI 48075-1000
Telephone: 248/746-0700
248/746-2760 (fax)

THOMAS J. HART
SLEVIN & HART, P.C.
1625 Massachusetts Avenue, NW,
Suite 450
Washington, DC 20036
Telephone: 202/797-8700
202/234-8231 (fax)

ANDREW F. ZAZZALI, JR.
ZAZZALI, FAGELLA, NOWAK,
KLEINBAUM & FRIEDMAN
One Riverfront Plaza, Suite 320
1037 Raymond Boulevard
Newark, NJ 07102
Telephone: 973/623-1822
973/623-2209 (fax)

Additional Counsel for Plaintiff